

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the
South District of Texas

Houston Division

United States Courts
Southern District of Texas
FILED

10/8/24

Nathan Ochsner, Clerk of Court

DR. LAKEISHA MENIFEE D/B/A DR. LAKEISHA
HAMILTON-REED, LAKEISHA HAMILTON

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ATTORNEY GENERAL OF TEXAS: KEN
PAXTON, HUMBLE POLICE DEPARTMENT,
HOUSTON POLICE DEPARTMENT, HARRIS
COUNTY PRECINT 4 CONSTABLES

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

*(to be filled in by the Clerk's Office)*Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	DR. LAKEISHA MENIFEE
Street Address	P.O. BOX 2992
City and County	HUMBLE TX
State and Zip Code	77347-2992
Telephone Number	832-755-2001
E-mail Address	N/A

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name	KEN PAXTON
Job or Title <i>(if known)</i>	ATTORNEY GENERAL OF TEXA
Street Address	PO Box 12548
City and County	Austin, TX
State and Zip Code	78711-2548
Telephone Number	512-463-2100
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	HUMBLE POLICE OFFICERS
Job or Title <i>(if known)</i>	BONDS OF POLICE OFFICERS THAT RENDERED SERVICE
Street Address	310 N Bender Ave
City and County	Humble, TX
State and Zip Code	77338
Telephone Number	281-446-7127
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	HOUSTON POLICE OFFICERS
Job or Title <i>(if known)</i>	BONDS OF POLICE OFFICERS THAT RENDERED SERVICE
Street Address	1200 Travis Street
City and County	Houston,
State and Zip Code	TX
Telephone Number	77002
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	HARRIS COUNTY PRECINT 4 CONSTABLES
Job or Title <i>(if known)</i>	BONDS OF POLICE OFFICERS THAT RENDERED SERVICE
Street Address	6831 Cypresswood Dr.
City and County	Spring, TX
State and Zip Code	77379
Telephone Number	832-927-6200
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Fair Debt Collection Practices Act as amended by Public Law 111-203, title X, 124 Stat. 2092 (2010) National Telecommunications and Information Administration Organization Act, 47 U.S.C. 901 et seq., as amended by the Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. 112-96, Title VI, Subtitle G, 126 Stat. 245 (Feb. 22, 2012) (47 U.S.C. 923(g)-(l), 928) and the Spectrum Pipeline Act of 2015, Title X of the Bipartisan Budget Act of 2015, Pub. L. 114-74, 129 Stat. 621 (Nov. 5, 2015) (47 U.S.C. 923, 928). TARIFFS Authority: 47 U.S.C. 151, 154(i), 154(j), 201-205, 403, unless otherwise noted. Source: 49 FR 40869, Oct. 18, 1984, unless otherwise noted. Minority Business Development Agency § 9.20 Backup power obligations.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* DR. LAKEISHA MENIFEE, is a citizen of the State of *(name)* TEXAS.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* KEN PAXTON, is a citizen of _____.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

the State of (name) TEXAS . Or is a citizen of
 (foreign nation) unknown .

b. If the defendant is a corporation

The defendant, (name) ATTORNEY GENERAL et al , is incorporated under
 the laws of the State of (name) TEXAS , and has its
 principal place of business in the State of (name) TEXAS .
 Or is incorporated under the laws of (foreign nation) TEXAS ,
 and has its principal place of business in (name) TEXAS .

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

2.5 BILLION amount in controversy, Ken Paxton failed to act and provided a protection for policing agencies that sex trafficked, assaulted and set bounty on Dr. Lakeisha Menifee and real property 19902 Rustlewood Dr. Humble, Texas.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Ken Paxton provided support for sex trafficking agencies to use in legal matters by way of Protective Order supplement documentation, and provided support to Rouge agents (Goodleap and Sunrun) that worked with policing agencies to provide technological support through artificial intelligence and violate Title 47 Code of Federal Regulations by placing UCC Property Lien on real property 19902 Rustlewood Dr., Humble Texas 77338 which allowed Goodleap to send continued text, robo and SPAM calls VIA E911 services to maintain backup power obligations to real property in the absence of landline, which is not available at aforementioned property with the absence of cable service. Dr. Lakeisha Menifee's phones were cloned by Harris County Precinct 4 Cybertech and additional phones were ordered and placed on ATT, TMOBILE, AND XFINITY (Which uses VERIZON CELL TOWERS). Ken Paxton failed to file a lawsuit against GOODLEAP and SUNRUN, and continued to create systems to cover up the experimental protocols done in the unregulated section of Harris County, Texas. Policing authorities failed to document police reports, that would properly highlight suspects that supported Harris County, Texas is the violations to Federal Policy and created a net of safety for criminals to continue to make attempts on the life of Dr. Lakeisha Menifee.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

2.5 Billion in additon to uncalculated amount to be provided in the motion.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

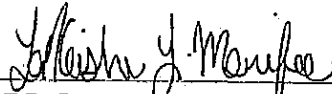
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

7/1/2024

Signature of Plaintiff



Printed Name of Plaintiff

DR. LAKEISHA MENIFEE**B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

State and Zip Code

Telephone Number

E-mail Address

All Remittance to P.O. Box due to
Mail Fraud by Police.